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November 11, 2011

OWTS Policy
State Water Resources Control Board
P.O. Box 2231, Sacramento, CA 95812

Sent via email to:
owts_commentletters@waterboards.ca.gov

Subject: Comment Letter – DRAFT OWTS Policy Documents

To whom it concerns:

The Soil Science Society of America (SSSA) is a progressive international scientific society that fosters the transfer of knowledge and practices to sustain global soils. SSSA is the professional home for 6,000+ members dedicated to advancing the field of soil science including the areas of environmental quality, ecosystem sustainability, agriculture, bioremediation, waste management, recycling, and wise land use. We support our members by providing quality research-based publications, educational programs, certifications, and science policy initiatives via a Washington, DC office. SSSA has been certifying soil scientists at the national level since the 1970s; licensure/certification by examination has been in place since 1997. We are committed to helping soil scientists achieve and uphold professional standards through the national certification process and/or licensing programs at the state level.

The SSSA has historically provided its support and encouraged legislation that provides for and continues regulation of the soil science profession in many states. SSSA is the professional organization that houses the Soil Science Certification program on a national level. Soil scientists certified through SSSA are certified as a Certified Professional Soil Scientists (CPSS). Certification requires that the individual completes specific education and experience requirements as well as have passed two examinations to obtain a certificate. Once certified, individuals are required to complete continuing education to maintain their certification.

We have been made aware of draft language pertaining to Onsite Wastewater Treatment Systems (OWTS) and understand that the State is accepting comments through November 14, 2011. That said, SSSA would like to offer comment on the proposed language and request that the State consider a change to the proposed language regarding qualified professionals.

Currently the proposed language contains the following definition of a professional qualified to do work with respect to OWTS in what is proposed as a statewide policy.

Qualified professional means an individual licensed or certified by a State of California agency to design and/or construct OWTS. Depending on the work to be performed and various licensing and registration requirements, this may include an individual who possesses a registered environmental health specialist certificate or is currently licensed as a professional engineer or professional geologist.

SSSA further notes that the State has taken the time and effort to include a large compilation of soil science information within Section 4.4 of the Substitute Preliminary Environmental Document. CPSS are well qualified to perform the work that is outlined within the proposed policy and undertake these types of projects all over the U.S. The exam performance objectives located on our web site will provide details as to what a CPSS must know and required to receive continuing education. Certified individuals are further bound by the Code of Ethics to practice only in areas that they qualified to do so.

Therefore, SSSA would request that the language dictating qualified professionals that may undertake OWTS work within the State be modified to include CPSS as qualified professionals.

The modification to the proposed language will provide a requirement for certified soil scientists to perform work that is soils based and help protect public welfare and property in California. Currently, certification for soil science is optional in California, but the addition of a requirement for an individual doing OWTS work to be a CPSS will help ensure additional protection from unqualified professionals practicing soil science. The requirement for a credential of CPSS would be no additional cost to the State of California because the SSSA Soils Certifying Board oversees the certification program.

SSSA believes that the proper application of soil science principles by soil scientists, and the services provided by soils professionals are critical to protect the environment, property, health, and public welfare through regulation of the practice of soil science. Below is a bullet point list of the advantages of certification within the professional practice of soil science.

Certified professionals:

- Protect the health, safety and welfare of the public and the environment of the state.
- Help to ensure that competent professionals are providing expertise on soils related issues.
- Must meet standards for education, experience and examination.
- Must pass national exams that are based on the Soil Science Performance Objectives, which define the state of the practice. The Performance Objectives

are updated every two years and are reviewed by the profession to ensure that they cover the type of work a soil scientist does.

- Provide increased accountability for professional work.
- Are required to uphold and practice ethics. Certified individuals are required to sign an ethics statement upon certification and are required to complete at least one credit in ethics training as part of their continuing education requirement. The inclusion of ethics in a certification program also assures procedures and penalties for those practicing unethically. The National Soils Certifying Board may investigate ethics violations and penalize the certificate holder in many ways including suspension or revocation of license, probation and additional ethics coursework.
- Are required to keep learning as they move through their career. Continuing education requirements are important in keeping a certificate up to date with the practice.

SSSA fully supports including Soil Science Certification language in your State Policy for OWTS. We will continue to offer support to soil scientists in California through our educational programs, which include exam preparation, interaction and networking within our professional organization, as well as facilitating continuing education opportunities for our professionals.

If you have any questions regarding our comments or need additional information, please contact Dr. Dawn Ferris, Soil Science Program Coordinator with SSSA at dferris@sciencesocieties.org or 608-819-3900.

Sincerely,

Charles W. Rice

Charles W. Rice, Ph.D.
President, Soil Science Society of America